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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report
Area 1 – Morrow Dam to Plainwell Dam (December 2007)

INDUSTRIAL

Dear Jim:

Attached is the tenth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigation/Feasibility Study (SRI/FS) – Area 1. This progress report is submitted as per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864), as well as Section 7.1 of the associated Statement of Work (SOW). If you have any questions, please do not hesitate to contact me.

Date:

January 15, 2008

Contact:

Michael J. Erickson, P.E.

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Our ref:

B0064524.00014 #2

Sincerely,

ARCADIS

Michael J. Erickson, P.E.
Associate Vice President

Attachment

Copies:

Michael Berkoff, USEPA
Sam Chummar, USEPA
Michael Ribordy, USEPA
Paul Bucholtz, MDEQ
Jeff Keiser, CH2M Hill
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**MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE SRI/FS
AREA 1 (MORROW DAM TO PLAINWELL DAM)**

REPORT #10, DECEMBER 2007

**PREPARED BY ARCADIS
JANUARY 15, 2008**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)

SUBMITTED TO

**JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)**

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #10, DECEMBER 2007

**Significant Developments and Activities during the Period, Including Actions Undertaken
Pursuant to the AOC and SOW**

- On December 5, ARCADIS notified USEPA of the access denial for the south top-of-bank sample for Transect ST-13.
- On December 6, USEPA notified ARCADIS that Jeff Keiser of CH2M Hill is serving as USEPA's consultant.
- On December 6, the KRSG submitted a surface sediment sampling plan for sampling the 2007 Plainwell Time-Critical Removal Action (TCRA) removal areas to USEPA and Michigan Department of Environmental Quality (MDEQ). This post-removal sediment sampling work is described in Section 3.4.5 of the SRI/FS Work Plan.
- On December 7, ARCADIS provided USEPA with a proposed analytical data submittal format for monthly progress reports.
- On December 12, ARCADIS transmitted to USEPA copies of letters previously submitted to MDEQ that present PCB data for the sediments and soils downstream of Lake Allegan Dam.
- On December 12, ARCADIS transmitted to CH2M Hill a copy of the August, September and October 2007 monthly reports and the 1st semi-annual progress report, at the request of Jim Saric.
- On December 12, ARCADIS participated in a conference call with USEPA and MDEQ to discuss the segmenting of the soil and sediment core samples collected along the mill race and the Kalamazoo River between the Plainwell No. 2 Dam and the confluence of the mill race and the river. The 2007 removal action sampling plan figures for the Plainwell TCRA were also discussed.
- On December 13, USEPA notified ARCADIS that it was approved to eliminate the south top-of-bank sample from Transect ST-13 due to access issues.
- On December 14, ARCADIS notified MDEQ and USEPA regarding the schedule for top-of-bank core processing. These cores were collected as per Section 3.4.1.2 of the SRI/FS Work Plan.
- On December 17, the KRSG submitted a request to USEPA that the revised surface sediment sampling plan for the Plainwell TCRA removal area end-of-year sampling be approved by USEPA and MDEQ prior to the commencement of sampling activities. The USEPA approved this request on December 17.

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- On December 17, ARCADIS wrote to USEPA to confirm our agreement to eliminate a sample (transect ST-13) due to access issues.
- On December 17, USEPA notified ARCADIS that it was approved to discontinue upstream-downstream water column sampling at the Plainwell Impoundment for the 2007 construction season.
- On December 19, USEPA notified ARCADIS regarding the required data format for the monthly progress reports.
- ARCADIS continues to obtain access agreements to permit the collection of SRI samples. Table A presents the landowner from whom ARCADIS has not received a signed access agreement as of December 31.
- The KRSG awaits acceptance of the Data Management Plan (see Section 1.3 of the SOW), which was submitted to USEPA on June 8, 2007.
- The KRSG awaits USEPA's comments on the draft Conceptual Site Model, which was submitted to USEPA on June 21, 2007. This report is discussed in Section 1.2.1.4 of the SOW.
- The KRSG awaits USEPA's response to the letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007.
- The KRSG awaits USEPA's comments on the draft risk assessment framework, which was submitted to USEPA on October 5, 2007. This framework is discussed in Section 1.2.1.5 of the SOW.

Data Collected and Field Activities Conducted During the Period

- On December 10, the KRSG notified USEPA and MDEQ that the end-of-year sediment sampling and bathymetric survey regarding the Plainwell TCRA were scheduled to begin during the week of December 17.
- Through December 19, ARCADIS continued to collect water column samples every other day at the upstream and downstream locations related to the Plainwell TCRA. Table B summarizes the samples collected that were sent to TestAmerica Laboratories, Inc. (TestAmerica) for analysis. This sampling is discussed in Section 3.4.5 of the SRI/FS Work Plan.
- On December 19, ARCADIS performed bathymetric monitoring following completion of the 2007 construction season activities associated with the Plainwell TCRA. The results of the monitoring are presented in Table C. This monitoring is discussed in Section 3.4.5 of the SRI/FS Work Plan.

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- On December 28, ARCADIS submitted to the Michigan Department of Natural Resources a summary of 2006 and 2007 fish collection activities performed at the Otsego City Impoundment.

Laboratory Data Received During the Period

- In December, ARCADIS received laboratory data for the surface water samples collected between November 9 and December 13 (sample delivery groups [SDGs] TCRA20 through TCRA24). Table B presents a list of the samples for which data were received. The February 2008 monthly report will present the validated surface water data for these samples.
- ARCADIS awaits the results for the surface water samples collected from December 15, 17 and 19.

Problems

- None.

Actions Taken to Correct Problems

- None.

Developments Anticipated During the Next Two Reporting Periods

- Based on revisions requested by USEPA on the surface sediment sampling plan for sampling the 2007 removal areas, KRSG is scheduled to submit a revised sampling location figure during the week of January 1, and upon USEPA approval, conduct sampling activities during the week of January 14.
- On January 8, ARCADIS is scheduled to segment the soil and sediment core samples collected along the mill race and the Kalamazoo River between the Plainwell No. 2 Dam and the confluence of the mill race and the river. The segments will be forwarded to TestAmerica for analysis. These cores were collected as per Section 3.4.1.2 of the SRI/FS Work Plan.
- In January, the KRSG will continue to work on the Baseline Ecological Risk Assessment Report Peer Review Process (see Section 1.2.1.3 of the SOW).
- By the end of February, ARCADIS plans to provide results of the historical inundation area reconnaissance in the Plainwell Dam No. 2 area and a proposed soil sampling plan for review by USEPA and MDEQ. This work is discussed in Section 3.4.2 of the SRI/FS Work Plan.
- By the end of February (pending access approval from landowner), ARCADIS personnel plan to delineate the materials associated with one of the focused samples collected in 2000 (FF-35)

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between the Crown Vantage Landfill and the Plainwell No. 2 Dam. This work is discussed in Section 3.4.4 of the SRI/FS Work Plan.

- In February, ARCADIS is scheduled to submit to USEPA the validated data for the SDGs received in November. This includes the surface water samples collected between October 14 and November 7 (SDGs TCRA11 through TCRA14), resident fish collected on November 6 and 7 in Otsego City Impoundment (SDG KAL437), surface sediment samples collected in October from between the Former Georgia-Pacific Mill Lagoons and Crown Vantage Landfill (SDGs SRI001 and SRI002), and surface sediment samples collected from Plainwell No. 2 Dam to the Mill Race Confluence (SDGs SRI003 and SRI004).
- On February 15, ARCADIS is scheduled to submit to USEPA the Annual Area Work Report for Area 1, as discussed in Section 1.1.1 of the SOW.
- On February 15, ARCADIS is scheduled to submit to USEPA the Semi-Annual Progress Report for the period from August 2007 through January 2008. This submittal is discussed in Section 7.2 of the SOW.
- On February 21, ARCADIS is scheduled to submit to USEPA the Preliminary Remedial Technology Screening (Section 1.2.2.1 of the SOW), the Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (Section 1.2.2.2. of the SOW), the Preliminary Permitting/Equivalency Requirements (Section 1.2.2.3 of the SOW), and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW).
- On February 21, the Responsible Parties are scheduled to submit to USEPA a financial security increase and financial guarantee as noted in Section XXVI Paragraphs 94 and 96 of the AOC.

**Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
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Table A — Pending Property Access Agreement (as of December 31, 2007)

Sample ID	Tax Map Entity	Parcel ID(s)	Owner Name /Taxpayer Name	Notes
FF-35	Cooper Township	02-15-251-010	William S. Walker L/L Eugene A. Lehman	Initial letter was picked up on September 12, 2007. Second letter delivered to house on October 16. Spoke with Mr. Walker on November 5 and he granted verbal approval. Forwarded access letter to Mr. Lehman on December 18.

Note:

1. Cooper Township (Kalamazoo County) tax maps obtained from Prein & Newhof and parcel information obtained online at <http://coopertwp.org>.

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Table B — Upstream/Downstream Surface Water Sampling — Plainwell TCRA — Samples
Collected and Data Received in December 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Sample Location
K30737	11/9/2007	12/5/2007	TCRA15_SDSP	10th Street Bridge
K30738	11/9/2007	12/5/2007	TCRA15_SDSP	Farmer Street Bridge
K30739	11/11/2007	12/5/2007	TCRA15_SDSP	Farmer Street Bridge
K30740	11/11/2007	12/5/2007	TCRA15_SDSP	10th Street Bridge
K30741	11/13/2007	12/7/2007	TCRA16_SDSP	10th Street Bridge
K30742	11/13/2007	12/7/2007	TCRA16_SDSP	Farmer Street Bridge
K30743	11/15/2007	12/7/2007	TCRA16_SDSP	10th Street Bridge
K30744	11/15/2007	12/7/2007	TCRA16_SDSP	Farmer Street Bridge
K30745	11/17/2007	12/7/2007	TCRA16_SDSP	10th Street Bridge
K30746	11/17/2007	12/7/2007	TCRA16_SDSP	Farmer Street Bridge
K30747	11/19/2007	12/19/2007	TCRA19_SDSP	10th Street Bridge
K30748	11/19/2007	12/19/2007	TCRA19_SDSP	Farmer Street Bridge
K30749	11/21/2007	12/19/2007	TCRA19_SDSP	10th Street Bridge
K30750	11/21/2007	12/19/2007	TCRA19_SDSP	Farmer Street Bridge
K30751	11/23/2007	12/19/2007	TCRA19_SDSP	10th Street Bridge
K30752	11/23/2007	12/19/2007	TCRA19_SDSP	Farmer Street Bridge
K30753	11/25/2007	12/19/2007	TCRA19_SDSP	10th Street Bridge
K30754	11/25/2007	12/19/2007	TCRA19_SDSP	Farmer Street Bridge
K30755	11/27/2007	12/19/2007	TCRA19_SDSP	10th Street Bridge
K30756	11/27/2007	12/19/2007	TCRA19_SDSP	Farmer Street Bridge
K30757 ¹	11/29/2007	12/20/2007	TCRA21_SDSP	10th Street Bridge
K30758 [K30759]	11/29/2007	12/20/2007	TCRA21_SDSP	Farmer Street Bridge
K30760	12/1/2007	12/31/2007	TCRA22_SDSP	10th Street Bridge ²
K30761	12/3/2007	12/31/2007	TCRA22_SDSP	10th Street Bridge
K30762	12/3/2007	12/31/2007	TCRA22_SDSP	Farmer Street Bridge
K30763	12/5/2007	12/31/2007	TCRA22_SDSP	10th Street Bridge
K30764	12/5/2007	12/31/2007	TCRA22_SDSP	Farmer Street Bridge
K30765	12/7/2007	12/31/2007	TCRA23_SDSP	10th Street Bridge
K30766	12/7/2007	12/31/2007	TCRA23_SDSP	Farmer Street Bridge
K30767	12/9/2007	12/31/2007	TCRA23_SDSP	10th Street Bridge
K30768	12/9/2007	12/31/2007	TCRA23_SDSP	Farmer Street Bridge
K30769	12/11/2007	12/31/2007	TCRA24_SDSP	10th Street Bridge
K30770	12/11/2007	12/31/2007	TCRA24_SDSP	Farmer Street Bridge
K30771	12/13/2007	12/31/2007	TCRA24_SDSP	10th Street Bridge
K30772	12/13/2007	12/31/2007	TCRA24_SDSP	Farmer Street Bridge
K30773	12/15/2007	NR	NR	10th Street Bridge
K30774	12/15/2007	NR	NR	Farmer Street Bridge
K30775	12/17/2007	NR	NR	10th Street Bridge
K30776	12/17/2007	NR	NR	Farmer Street Bridge
K30777	12/19/2007	NR	NR	10th Street Bridge
K30778	12/19/2007	NR	NR	Farmer Street Bridge

Notes:

NR - Data not received as of December 31, 2007.

All samples analyzed by TestAmerica Laboratories, Inc. for PCBs and TSS.

Duplicate samples are in brackets.

¹MS/MSD performed on this sample.

²No sample collected at Farmer Street due to freezing.

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Table C — Post-Dredging Bathymetry — Plainwell TCRA — December 2007

Transect	Date	Station	Transect Width (ft)	Distance from Right Bank (ft)	Water Depth (ft)
2	12/19/2007	T2-1	157	0	0.0
	12/19/2007	T2-2	157	11	5.0
	12/19/2007	T2-3	157	22	8.7
	12/19/2007	T2-4	157	33	6.0
	12/19/2007	T2-5	157	44	5.5
	12/19/2007	T2-6	157	55	5.2
	12/19/2007	T2-7	157	66	5.3
	12/19/2007	T2-8	157	77	5.4
	12/19/2007	T2-9	157	88	5.9
	12/19/2007	T2-10	157	99	6.8
	12/19/2007	T2-11	157	110	6.4
	12/19/2007	T2-12	157	121	7.2
	12/19/2007	T2-13	157	132	6.2
	12/19/2007	T2-14	157	143	6.0
	12/19/2007	T2-15	157	154	0.6
3	12/19/2007	T3-1	150	0	0.0
	12/19/2007	T3-2	150	11	4.8
	12/19/2007	T3-3	150	22	4.8
	12/19/2007	T3-4	150	33	5.0
	12/19/2007	T3-5	150	44	5.0
	12/19/2007	T3-6	150	55	5.3
	12/19/2007	T3-7	150	66	6.1
	12/19/2007	T3-8	150	77	5.9
	12/19/2007	T3-9	150	88	6.4
	12/19/2007	T3-10	150	99	7.0
	12/19/2007	T3-11	150	110	7.3
	12/19/2007	T3-12	150	121	7.0
	12/19/2007	T3-13	150	132	6.0
	12/19/2007	T3-14	150	143	4.8
	12/19/2007	T3-15	150	150	0.3
4	12/19/2007	T4-1	137	0	0.2
	12/19/2007	T4-2	137	10	3.0
	12/19/2007	T4-3	137	20	5.0
	12/19/2007	T4-4	137	30	7.3
	12/19/2007	T4-5	137	40	9.3
	12/19/2007	T4-6	137	50	10.0
	12/19/2007	T4-7	137	60	10.3
	12/19/2007	T4-8	137	70	10.2
	12/19/2007	T4-9	137	80	8.0
	12/19/2007	T4-10	137	90	7.0
	12/19/2007	T4-11	137	100	6.0
	12/19/2007	T4-12	137	110	6.0
	12/19/2007	T4-13	137	120	5.2
	12/19/2007	T4-14	137	130	2.0
	12/19/2007	T4-15	137	137	0.0

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Table C — Post-Dredging Bathymetry — Plainwell TCRA — December 2007

Transect	Date	Station	Transect Width (ft)	Distance from Right Bank (ft)	Water Depth (ft)
5	12/19/2007	T5-1	146	0	0.7
	12/19/2007	T5-2	146	10	3.8
	12/19/2007	T5-3	146	20	6.5
	12/19/2007	T5-4	146	30	7.8
	12/19/2007	T5-5	146	40	8.4
	12/19/2007	T5-6	146	50	8.7
	12/19/2007	T5-7	146	60	8.4
	12/19/2007	T5-8	146	70	7.0
	12/19/2007	T5-9	146	80	6.6
	12/19/2007	T5-10	146	90	5.7
	12/19/2007	T5-11	146	100	4.8
	12/19/2007	T5-12	146	110	4.1
	12/19/2007	T5-13	146	120	3.5
	12/19/2007	T5-14	146	130	3.0
	12/19/2007	T5-15	146	146	0.2
6	12/19/2007	T6-1	158	0	0.0
	12/19/2007	T6-2	158	11	3.0
	12/19/2007	T6-3	158	22	5.0
	12/19/2007	T6-4	158	33	6.0
	12/19/2007	T6-5	158	44	6.5
	12/19/2007	T6-6	158	55	6.7
	12/19/2007	T6-7	158	66	6.5
	12/19/2007	T6-8	158	77	6.4
	12/19/2007	T6-9	158	88	6.3
	12/19/2007	T6-10	158	99	6.2
	12/19/2007	T6-11	158	110	6.1
	12/19/2007	T6-12	158	121	5.9
	12/19/2007	T6-13	158	132	5.4
	12/19/2007	T6-14	158	143	5.7
	12/19/2007	T6-15	158	158	0.0
7	12/19/2007	T7-1	159	0	0.0
	12/19/2007	T7-2	159	11	5.8
	12/19/2007	T7-3	159	22	6.5
	12/19/2007	T7-4	159	33	6.9
	12/19/2007	T7-5	159	44	7.3
	12/19/2007	T7-6	159	55	7.5
	12/19/2007	T7-7	159	66	7.5
	12/19/2007	T7-8	159	77	6.9
	12/19/2007	T7-9	159	88	5.9
	12/19/2007	T7-10	159	99	5.0
	12/19/2007	T7-11	159	110	4.4
	12/19/2007	T7-12	159	121	2.5
	12/19/2007	T7-13	159	132	1.5
	12/19/2007	T7-14	159	143	1.0
	12/19/2007	T7-15	159	159	0.0

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Table C — Post-Dredging Bathymetry — Plainwell TCRA — December 2007

Transect	Date	Station	Transect Width (ft)	Distance from Right Bank (ft)	Water Depth (ft)
8	12/19/2007	T8-1	172	0	2.0
	12/19/2007	T8-2	172	12	3.3
	12/19/2007	T8-3	172	24	4.5
	12/19/2007	T8-4	172	36	4.8
	12/19/2007	T8-5	172	48	4.7
	12/19/2007	T8-6	172	60	4.5
	12/19/2007	T8-7	172	72	4.6
	12/19/2007	T8-8	172	84	5.3
	12/19/2007	T8-9	172	96	6.0
	12/19/2007	T8-10	172	108	6.0
	12/19/2007	T8-11	172	120	5.4
	12/19/2007	T8-12	172	132	4.8
	12/19/2007	T8-13	172	144	5.0
	12/19/2007	T8-14	172	156	5.9
	12/19/2007	T8-15	172	172	1.8
9	12/19/2007	T9-1	183	0	0.0
	12/19/2007	T9-2	183	13	1.5
	12/19/2007	T9-3	183	26	1.5
	12/19/2007	T9-4	183	39	5.0
	12/19/2007	T9-5	183	52	5.2
	12/19/2007	T9-6	183	65	5.0
	12/19/2007	T9-7	183	78	4.5
	12/19/2007	T9-8	183	91	4.7
	12/19/2007	T9-9	183	104	5.2
	12/19/2007	T9-10	183	117	5.6
	12/19/2007	T9-11	183	130	6.5
	12/19/2007	T9-12	183	143	6.0
	12/19/2007	T9-13	183	156	6.3
	12/19/2007	T9-14	183	169	2.0
	12/19/2007	T9-15	183	183	0.0
10	12/19/2007	T10-1	228	0	0.6
	12/19/2007	T10-2	228	16	4.0
	12/19/2007	T10-3	228	32	4.0
	12/19/2007	T10-4	228	48	3.8
	12/19/2007	T10-5	228	64	2.7
	12/19/2007	T10-6	228	80	2.7
	12/19/2007	T10-7	228	96	3.0
	12/19/2007	T10-8	228	112	3.8
	12/19/2007	T10-9	228	128	3.5
	12/19/2007	T10-10	228	144	2.8
	12/19/2007	T10-11	228	160	2.8
	12/19/2007	T10-12	228	176	3.0
	12/19/2007	T10-13	228	192	2.9
	12/19/2007	T10-14	228	208	3.5
	12/19/2007	T10-15	228	228	0.0